

LAW OFFICES OF
MICHAEL S. ROSS
THE LINCOLN BUILDING
60 EAST 42ND STREET
FORTY-SEVENTH FLOOR
NEW YORK, NY 10165

TELEPHONE
(212) 505-4060
FACSIMILE
(212) 505-4054
E-MAIL
michaelross@rosslaw.org

December 20, 2011

BY ECF AND BY HAND

Honorable Sterling Johnson
Senior United States District Court Judge
United States District Court
for the Eastern District of New York
225 Cadman Plaza East
New York, New York 10007

Re: United States v. Igor Ladanov, et al.;
10-cr-00472 (SJ)

Dear Judge Johnson:

I represent the defendant Igor Ladanov in the above-captioned case pending before Your Honor. Mr. Ladanov's sentencing is now scheduled for January 4, 2012 at 9:30 a.m. I write this letter to address two requests: first, to request an adjournment of the currently scheduled January 4, 2012 sentencing; and second, to ask for a temporary modification of Mr. Ladanov's bail conditions to allow him to take a brief trip to Vermont next week.

First, Mr. Ladanov's sentencing was originally scheduled for December 6th at 9:30 a.m., but was adjourned to permit the Probation Department to respond to issues raised in the parties' sentencing submissions to Your Honor. The Court re-scheduled the sentencing to January 4, 2012 at 9:30 a.m. That date presents a significant problem for me. I am the co-founder (in 1984) and presently one of the team leaders of Benjamin N. Cardozo Law School's Intensive Trial Advocacy Program. I also perform demonstrations for the 130-plus students, work with our visiting faculty and I am responsible for the day-to-day quality control of the program in terms of dealing with teaching issues relating to the introduction of evidence. The program runs for the first two weeks of January, from January 3rd through January 17th, every day from 9:00 a.m. to 5:00 p.m., except Saturday.

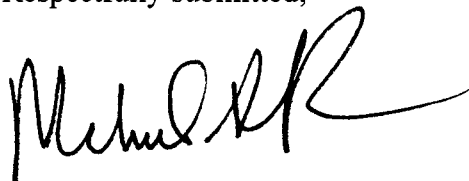
LAW OFFICES OF
MICHAEL S. ROSS

Honorable Sterling Johnson
December 20, 2011
Page 2

I am hopeful, therefore, that Your Honor would be willing to adjourn the sentencing of Mr. Ladanov until after January 17th. I have discussed this matter with Assistant United States Attorney Daniel Brownell and Georges Lederman, Esq., counsel for the co-defendant, Artem Yuryev (who is scheduled to be sentenced at the same time as my client, Mr. Ladanov), and they do not object to my request for an adjournment of the sentencing to a date after January 17th. Pursuant to Your Honor's individual rules, I have discussed the possible rescheduling of the sentencing with counsel to all parties, and three proposed alternative dates on which counsel for all parties are available are January 19th, 20th or 26th.

Second, my client is currently on bail and his travel is restricted to the Eastern and Southern Districts of New York. Mr. Ladanov would like to travel to Mountain Inn, located at 47 Old Mill Road, Killington, Vermont, for a four day stay from December 29th through January 2nd. I have contacted Assistant United States Attorney Brownell, and he has indicated that he does not oppose this request. My office has also contacted Mr. Ladanov's Pretrial Services Officer Ryan H. Lehr, and he does not oppose the request. Accordingly, I respectfully request that Your Honor issue an Order temporarily modifying Mr. Ladanov's bail conditions to permit him to travel to Killington, Vermont, from December 29th through January 2nd.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Michael S. Ross", with a stylized flourish at the end.

Michael S. Ross

cc: A.U.S.A. Daniel Brownell
(By Electronic Mail)

Georges Lederman, Esq.
(By Electronic Mail)

Mr. Ryan H. Lehr
U.S. Pretrial Services Officer
(By Electronic Mail)